

TRUJILLO RODRIGUEZ & RICHARDS, LLC

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Counsel for Plaintiffs

**UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF NEW JERSEY**

PATRICK BRADY, et al.	:	Civil Action No. 02-2917 (JEI)
	:	
Plaintiffs,	:	
	:	
v.	:	
	:	
AIR LINE PILOTS ASSOCIATION,	:	
INTERNATIONAL,	:	
	:	
Defendant.	:	
	:	

**PLAINTIFFS' NOTICE OF MOTION FOR PROTECTIVE ORDER PRECLUDING
DEPOSITIONS OF SCOTT SCHWARTZ AND JOHN HEFLEY**

TO: Daniel M. Katz, Esq.	John C. Connell, Esq.
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PLEASE TAKE NOTICE that on February 4, 2013, Plaintiffs shall move before the United States District Court, District of New Jersey, Mitchell H. Cohen U.S. Courthouse, One John F. Gerry Plaza, Fourth and Cooper Streets, Camden, New Jersey, for a Protective Order Precluding the Depositions of Scott Schwartz and John Hefley.

In support of this motion, Plaintiffs will rely upon the accompanying Memorandum of Law and Certification of Allen P. Press. A proposed Form of Order is enclosed.

Oral Argument is requested if opposed.

Dated: January 10, 2013

Respectfully submitted,

TRUJILLO RODRIGUEZ & RICHARDS, LLC

By: s/ Lisa J. Rodriguez

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